

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH FELTS,)	
)	
Plaintiff,)	
)	
v.)	Cause No.: 4:20-cv-0821-JAR
)	
JOSEPH VOLLMER, in his official)	
capacity as President of the Board)	
of Aldermen of the City of St. Louis,)	
)	
Defendant.)	

MOTION TO SUBSTITUTE PARTIES

COMES NOW Defendant Joseph Vollmer, by and through the undersigned, and pursuant to Rule 25(d), hereby moves the Court enter an order substituting Megan Green, in her capacity as President of the Board of Aldermen of the City of St. Louis, as the party-defendant in this Cause, and in support thereof states the following:

1. Joseph Vollmer, in his capacity as President of the Board of Aldermen, was substituted previously by the Court as the party-defendant for Lewis Reed, who resigned from that position.
2. On November 28, 2022, Megan Green was sworn in as the duly elected President of the Board of Aldermen of the City of St. Louis.
3. Accordingly, Megan Green, and not Joseph Vollmer, is the President of the Board of Aldermen.

4. Rule 25(d) provides that “an action does not abate” when a public official “ceases to hold office while the action is pending,” but instead the “successor is automatically substituted as a party.” The Rule further provides that subsequent proceedings “should be in the substituted party’s name.”

WHEREFORE, Defendant moves the Court enter an order reflecting that Megan Green is substituted as the party-defendant for Joseph Vollmer herein pursuant to Rule 25(d), and directing that the Court’s record reflect same.

Respectfully submitted,

**SHEENA HAMILTON
CITY COUNSELOR**

By: /s/ Steven R. Kratky

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and complete copy of the foregoing was served upon all counsel of record on this 13th day of December, 2022, by filing same in the Court’s electronic filing system.

/s/ Steven R. Kratky